



communications

BT Fuze Products

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5 February 2007

Bureau of Land Recycling and Waste Management
Pennsylvania Department of Environmental Protection
Southcentral Regional Office
909 Elmerton Avenue
Harrisburg, PA 17710

RE: Notification of Closeout of Hazardous Waste Permit-by-Rule Activity
BT Fuze Products, Lancaster, PA (PAR 000504829)

Dear Sir or Madam:

This letter has been prepared to notify PADEP that BT Fuze Products has ceased operation of its permit-by-rule elementary neutralization and wastewater treatment system, because manufacturing operations at the Lancaster location have closed and moved out of state. The wastewater treatment system tanks and treatment units that held chemicals or wastewater, plus the floors and floor sump were cleaned and tested in accordance with BT Fuze Products requirements.

In addition, the facility has shipped off remaining hazardous wastes that were in its small-quantity generator hazardous waste container accumulation area, and the area, including the containment sump, has been high-pressure water washed. Thus, operations in this area have ceased.

Please make a note of these changes in your departmental files. Should you have any questions, please call me at (717) 735-0300, Extn. 2610.

Very truly yours,

Nick Martyniuk
Manager, Chemistry Lab Services



communications

BT Fuze Products

January 19, 2007

PA Department of Environmental Protection
Bureau of Land Recycling and Waste Management
Southcentral Region
909 Elmerton Ave.
Harrisburg, PA 17110

Dear Sir or Madam:

This is Notification for discontinuation of BT Fuze Products Division of L-3 Communications Corp. Hazardous Waste Permit-By-Rule Activities at 103 N. Queen Street, Lancaster, PA.

BT Fuze products has shutdown the manufacturing processes, Chemistry Laboratory and Metal Finishing Department located at this facility. BT Fuze Products has discontinued the use of the wastewater pretreatment system that treats the rinses and solutions from these operations. BT Fuze Products has discontinued to discharge effluent to the City of Lancaster sewer system (POTW) and have discontinued the Industrial Waste Discharge Permit (#1012) issued by the City of Lancaster.

All the processes and equipment listed on the previous Notification of Hazardous Waste Permit-By-Rule Activities are discontinued or are no longer in use. BT Fuze Products EPA ID Number for this facility is PAR000504829.

Please feel free to contact me if you have any questions at (717) 735-0300 ext. 2610 or with email at nick.martyniuk@l-3com.com.

Sincerely,

Nick Martyniuk
Manager Chemistry Laboratory Services

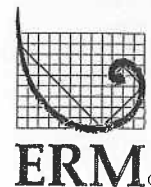
**Environmental
Resources
Management**

350 Eagleview Boulevard
Suite 200
Exton, PA 19341
(610) 524-3500
(610) 524-7335 (fax)
<http://www.erm.com>

5 February 2007

Nick Martyniuk
BT Fuze Products Division
L-3 Communications Corporation
103 North Queen St.
Lancaster, PA 17604

RE: Certification of Closure of Hazardous Waste Permit-by-Rule
Wastewater Treatment Facility
BT Fuze Products, Lancaster, PA



Dear Mr. Martyniuk:

As requested by BT Fuze Products, this letter hereby certifies that the closure and decommissioning of the above-captioned facility. This certification is not mandated by PADEP; however, it has been requested for completeness by BT Fuze Products.

Wastewater treatment units covered under permit-by-rule (25 Pa. Code 270a.60(b)(1)) are required to meet 40 CFR 265 Subpart Q, except for 40 CFR 265.400. In 40 CFR 265.404, closure requirements are limited to "at closure, all hazardous waste and hazardous waste residues must be removed from treatment processes or equipment, discharge control equipment, and discharge confinement structures." ERM hereby certifies that the treatment system components contacting hazardous waste have been emptied and cleaned to the extent practical.

The sequence of operations in decommissioning and pressure-washing the wastewater treatment plant was as follows:

- treat any remaining process wastewater, drawing down the contents of each successive treatment tank from the front of the system to the lamella clarifier;
- draw down the treatment system reagent tanks;
- pressure wash the treatment tanks and reagent tanks using a PowerEase BE Commercial Pressure Washer (3,000 to 4,000 psi at 4 gpm);

- transfer sludge from lamella clarifier to sludge holding tank and then to filter press;
- pressure-wash lamella clarifier, transfer to sludge holding tank;
- drain sludge holding tank, pressure-wash and feed to filter press; and
- pressure-wash filter press after last cake drop.

This certification is based upon the following observations made by ERM:

- site visit of 9/7/06, to view the wastewater treatment units to be cleaned;
- site visit of 9/21/06, to view the wastewater reagent tanks that had been emptied;
- site visit of 9/28/06, to view emptied and pressure-washed wastewater process tanks, equipment, floor, and sump; and
- wipe sampling on 9/29/06 of the locations listed in the table below. Wipe sampling was conducted in accordance with ASTM Method D 6966-03, using a 100 sq. cm stiff cardboard wipe template and Environmental Express Ghost Wipes (15 x 15 sq. cm, pre-moistened with deionized water) for wipe sampling. Wipe sampling was conducted by thoroughly rubbing the wipe against the surface to be sampled, in accordance with Method D 6966-03, and being careful to not transfer residues from the wipe to the gloved hand of the sampler as the wipe was being folded during sampling. Samples were analyzed by Test America Analytical Testing Corporation, King of Prussia, Pennsylvania. The wipe sampling results are as follows:

Sample Location	Total Cyanide, ug/wipe	Total Chromium, mg/wipe	Total Nickel, mg/wipe
pH Adjustment Tank	<2	not tested	not tested
Chrome Reduction Tank	not tested	0.27	not tested
Wastewater sump wall	not tested	1.9	0.20

Sample locations and analytes were selected by BT Fuze Products, based upon the wastewater being treated in the tank in question or, for the sump, the primary constituents of concern in the wastewater generally.

The highest concentration observed, 0.019mg/sq. cm, is below the 1 mg/sq. cm standard set by BT Fuze Products; and

- off-site shipment of filter press cake following previous practice, as a hazardous waste. Off-site shipment of surplus treatment chemicals was confirmed through review of waste manifests and certificates of treatment/disposal.

There were two units with the wastewater treatment area that were noted by ERM as having residues that the pressure washing was evidently unable to remove:

- Cyanide Destruct Tank No. 1—residue present at the working level of the tank, on the side walls. Because the tank is plastic, BT Fuze and its contractor did not deem it prudent to to apply a higher-pressure wash to the walls.
- Wastewater Area Sump—indentations and irregularities in the concrete of the sump wall exhibited residue that the pressure washing did not dislodge. This area was wipe sampled and found to contain levels of chromium and nickel below the standard set by BT Fuze Products. Accordingly, no further cleaning of this unit was done.

We trust that the above information is satisfactory for your needs. Should you have any questions on this certification, please contact me at (610) 524-3511.

Very truly yours,

Ruth E Baker

Ruth E. Baker, P.E.
Project Manager